

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:

WBH Energy, LP

Case No: 15-10003-hcm

Chapter 11

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Garry M. Graber ("Applicant") moves  
this court to grant admission to the United States Bankruptcy Court for the Western  
District of Texas *pro hac vice* to represent U.S. Energy Development Corporation in this case,  
and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the  
name of)

Hodgson Russ LLP,

with offices at

Mailing address: 140 Pearl Street, Suite 100

City, State, Zip: Buffalo, New York 14202

Telephone: 716 856-4000 Fax: 716 849-0349

Email Address: ggrab@hodgsonruss.com

2. Since 1979, Applicant has been and  
presently is a member of and in good standing with the Bar of the State of  
New York. Applicant's bar license number is 1344159.

3. Applicant has been admitted to practice before the following state and federal courts:

Court:	Admission date:
<u>Western Dist. of NY-District &amp; Bankruptcy</u>	<u>1979</u>
<u>Eastern Dist of NY-District &amp; Bankruptcy</u>	<u>5/29/1990</u>
<u>Southern Dist of NY-District &amp; Bankruptcy</u>	<u>5/29/1990</u>
<u>Northern Dist of NY-District &amp; Bankruptcy</u>	<u>7/17/1980</u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, and is not currently suspended or disbarred in any other court, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

Admission to FL bar suspended for failure to pay dues as I no longer practice in FL. I am working on resolution and voluntary withdrawal.

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided below:

n/a

6. Applicant is eligible to practice in the Bankruptcy Court.

7. Applicant has read and is familiar with the Local Rules of the Western District of Texas Bankruptcy Court and is also subject to all rules of practice of the U.S. District Court of the Western District of Texas and will comply with the standards of practice set out therein.

8. ☒ Applicant has not requested admission pro hac vice in the Bankruptcy Court for the Western District of Texas in the preceding twelve months.

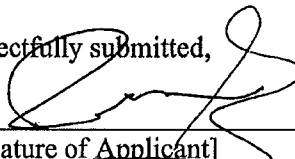
or

☐ Applicant has filed the motions for admission pro hac vice in the preceding twelve months.

Case Name/Number	Date Filed	Disposition of Motion
_____	_____	_____
_____	_____	_____
_____	_____	_____

Wherefore, Applicant prays that this Court enter an order permitting the admission of Garry M. Graber to the U.S. Bankruptcy Court Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,

  
[Signature of Applicant]

Garry M. Graber  
[Printed name of Applicant]

140 Pearl St, Ste 100, Buffalo, NY 14202  
[Address of Applicant]

(716) 856-4000  
[Telephone of Applicant]

ggrab@hodgsonruss.com  
[Email address of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion  
upon each attorney of record and the original upon the Clerk of Court on this the \_\_\_\_\_ 6<sup>th</sup>  
Day of January, 2015.

/s/ Garry M. Graber

[Signature of Applicant]

Garry M. Graber

[Printed name of Applicant]

140 Pearl St., Ste 100; Buffalo, NY 14202

[Address of Applicant]

(716) 856-4000

[Telephone of Applicant]

ggraber@hodgsonruss.com

[Email address of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon those parties receiving the Court's ECF e-mail notification and on the parties on the attached service list by depositing same in the United States First Class Mail on this 6th day of January, 2015.

/s/ Eric J. Taube

Eric J. Taube

State Bar No. 19679350

Mark C. Taylor

State Bar No. 19713225

HOHMANN, TAUBE & SUMMERS, L.L.P.

100 Congress Avenue, 18th Floor

Austin, Texas 78701

(512) 472-5997

(512) 472-5248 (FAX)

erict@hts-law.com

markt@hts-law.com

## **SERVICE LIST**

### **DEBTORS**

WBH Energy, LP, WBH Energy Partners, LLC and WBH Energy GP, LLC

Attn: Joe Warnock  
PO Box 302380  
Austin, TX 78703

Gladiator Energy Services, LLC  
PO Box 162546  
Austin, TX 78716

Nabors Drilling USA, LP  
PO Box 973527  
Dallas, TX 75397

Blowout Tools, Inc.  
PO Box 62600, Dept. 1260  
New Orleans, LA 70162

West Fork Enterprises, Inc.  
259 CR 1510  
Bridgeport, TX 76426

### **DEBTORS' PROFESSIONALS**

Bracewell & Giuliani LLP  
Attn: William A. (Trey) Wood III and Jason G. Cohen  
711 Louisiana, Suite 2300  
Houston, TX 77002

Inwell, Inc.  
504 Spring Hill Dr., Suite 300  
Spring, TX 77386

Cressman Tubular Products Corp.  
3939 Beltline Rd., Ste. 460  
Addison, TX 75001

Energy Service Company of Bowie  
PO Box 1300  
Bowie, TX 76230

Key Energy Services, Inc.  
PO Box 4649  
Houston, TX 77210

### **UNITED STATES TRUSTEE**

Office of The United States Trustee  
903 San Jacinto Blvd. Suite 230  
Austin, TX 78701

Halliburton Energy Services, Inc.  
PO Box 301341  
Dallas, TX 75303

DK Rig Movers  
8755 Hwy 87 E.  
San Antonio, TX 78263

### **GOVERNMENTAL ENTITIES**

Internal Revenue Service  
Special Procedures-Insolvency  
PO Box 7346  
Philadelphia, PA 19101-7346

Orr Construction, Inc.  
PO Box 268984  
Oklahoma City, OK 73126

SWECO  
PO Box 123411, Dept. 3411  
Dallas, TX 75312

Securities & Exchange  
Commission  
100 F St. NE  
Washington, DC 20549

Morrison Supply Company  
PO Box 70  
Fort Worth, TX 76101

Champion Technologies, Inc.  
PO Box 2243  
Houston, TX 77252

Challenger Process Systems Co.  
PO Box 731411  
Dallas, TX 75373

Weatherford US, LP  
PO Box 301003  
Dallas, TX 75303

### **SECURED CREDITORS**

#### **(CONSOLIDATED)**

CL III Funding Holding Company, LLC

Attn: Luke Beltnick  
4600 Wells Fargo Center  
90 South 7th Street  
Minneapolis, MN 55402

Basic Energy Services, LP  
PO Box 841903  
Dallas, TX 75284

Nabors Completion & Production Services  
PO Box 975682  
Dallas, TX 75397

Energy Oilfield Services, LLC  
15425 North Freeway Suite 140  
Houston, TX 77090

Gainesville Fuel, Inc.  
PO Box 3445  
San Angelo, TX 76902

Snow Spence Green LLP  
Attn: Phil Snow & Kenneth Green  
America Tower  
2929 Allen Parkway, Suite 2800  
Houston, TX 77019

PLPS, Inc.  
PO Box 700  
Pearland, TX 77588

Industrial Outfitters, Inc.  
PO Box 6838  
Abilene, TX 79608

J&P Transport LLC  
PO Box 459  
Muenster, TX 76252

Kyle Erwin Construction, LLC  
PO Box 643  
Boyd, TX 76023

### **TOP 30 UNSECURED**

#### **CREDITORS**

#### **(CONSOLIDATED)**

Pumpco Energy Services, Inc.  
PO Box 202295  
Dallas, TX 75320

Multi-Chem Group, LLC  
PO Box 974320  
Dallas, TX 75397

Danlin Industries Corporation  
PO Box 123420  
Dallas, TX 75312

Quinn Pumps  
PO Box 677347  
Dallas, TX 75267

Flowco Production Solutions  
2731 Spring Stuebner Rd., Ste. N  
Spring, TX 77389

Crest Process Systems, Inc.  
2600 Robertson Road  
Tyler, TX 75701

**HOLDERS OF EQUITY  
INTERESTS IN DEBTORS**

Ryen Burrus  
4407 Bee Cave Road, Ste. 421  
Austin, TX 78746

David Henderson  
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Joe Warnock  
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Austin, TX 78746

Jacob Warnock  
4407 Bee Cave Road, Ste. 421  
Austin, TX 78746

Rand Winfrey  
4407 Bee Cave Road, Ste. 421  
Austin, TX 78746

**OTHER PARTIES IN  
INTEREST**

U.S. Energy Development  
Corporation  
Attn: Ryan O. Holbrook, Esq.,  
Corporate Counsel  
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Getzville, NY 14068

Law Offices of M. Steve Smith  
Attn: M. Steve Smith  
1177 West Loop S., Suite 1100  
Houston, TX 77027

Spiller & Spiller  
Attn: David Spiller  
122 E. Belknap  
Jacksboro, TX 76458